

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOINT STOCK COMPANY “Channel One Russia
Worldwide,” et als.,

Plaintiffs,

v.

INFOMIR LLC, et als.,

Defendants.

Civil Action No. 1:16-cv-01318
(GBD)(BCM)

**NOTICE OF MOTION TO
EXCLUDE PLAINTIFFS’ EXPERTS**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that in accordance with the schedule set by the Court, Defendant, Infomir LLC, by and through its attorneys, Berkowitz, Lichtstein, Kuritsky, Giasullo & Gross, LLC, will move before the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York for an Order excluding Plaintiffs’ Experts Jonathan Bari and Dmitri Dietrich.

PLEASE TAKE FURTHER NOTICE, that in support of the motion, Defendant shall rely upon the attached Brief and Declaration of Stewart M. Leviss, Esq., submitted herewith, and all of the papers and pleadings heretofore filed in this action.

PLEASE TAKE FURTHER NOTICE, that pursuant to Local Rule 6.1(c), Defendant respectfully requests oral argument, if this motion is opposed.

**BERKOWITZ, LICHTSTEIN,
KURITSKY, GIASULLO & GROSS, L.L.C.**
Attorneys for Defendant, Infomir LLC

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Dated: February 16, 2021